

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 Robert.Freeman@lewisbrisbois.com
E. MATTHEW FREEMAN
3 Nevada Bar No. 14198
Matt.Freeman@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
702.893.3383
6 FAX: 702.893.3789
Attorneys for Defendants
7

8 NORTH LAS VEGAS CITY ATTORNEY
MICHAELA RUSTIA MOORE
9 Nevada Bar No. 9676
City Attorney
10 moorem@cityofnorthlasvegas.com
NOEL E. EIDSMORE
11 Nevada Bar No. 7688
Chief Deputy City Attorney
12 eidsmoren@cityofnorthlasvegas.com
2250 Las Vegas Blvd. North, Suite 810
13 North Las Vegas, Nevada 89030
702 633.1050
14 FAX: 702.649.8879
Attorneys for Defendants
15

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 ***

19 CHERIE BLACKMON, individually,

CASE NO. 2:23-cv-2109-APG-DGA

20 Plaintiff,

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

21 vs.

22 JARROD MINOR, individually; CITY OF
NORTH LAS VEGAS, a political subdivision
23 of the State of Nevada; DOE CORRECTIONS
OFFICERS I – X;

24 Defendants.
25

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by ninety (90) days, up to and including Monday, November 11, 2024. In addition, the parties request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as follows:

1. On December 21, 2023, Plaintiff filed her Complaint in the United States District Court, District of Nevada.
2. On February 12, 2024, Defendants Filed their Answer.
3. On March 7, 2024, the Court entered the Discovery Plan and Scheduling Order.
4. On March 18, 2024, Plaintiff served her Initial FRCP 26 Disclosures.
5. On March 18, 2024, Defendants served their Initial FRCP 26 Disclosures.
6. On April 23, 2024, Plaintiff served her First Supplement to Initial FRCP 26 Disclosures.
7. The deposition of Jarrod Minor is set for May 20, 2024.

DISCOVERY REMAINING

1. The parties will serve written discovery.
2. Defendants will depose Plaintiff.
3. Plaintiff may depose the Defendant and/or Rule 30(b)(6) designee.
4. Defendants will collect any and all relevant medical and/or mental health records and/or billing related to the allegations contained in Plaintiff's First Amended Complaint.
5. Defendants may depose Plaintiff's medical and/or mental health providers once able to collect any and all relevant medical and/or mental health records and billing.
6. The parties may depose any and all other witnesses identified through discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested

1 extension. This Request for an extension of time is not sought for to delay the proceedings or for
 2 any improper purpose.

3 Counsel for Defendant is associated in on this case on April 23, 2024. In addition, counsel
 4 is attending to family obligations involving medical issues over the next few months that will
 5 continue to require him to be out of the jurisdiction for extended periods of time. The obligation is
 6 unavoidable.

7 For those reasons, the parties respectfully request an extension of the discovery deadlines
 8 in this matter.

9 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs
 10 modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or
 11 motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than
 12 twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR
 13 26-3.

14 This is the first request for extension of time in this matter. The parties respectfully submit
 15 that the reasons set forth above constitute compelling reasons for the short extension.

16 The following is a list of the current discovery deadlines and the parties' proposed
 17 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Monday, August 12, 2024</i>	<i>Tuesday, November 12, 2024</i>
Deadline to Amend Pleadings or Add Parties	<i>Tuesday, May 14, 2024</i>	<i>Closed</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Thursday, June 13, 2024</i>	<i>Friday, September 13, 2024</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Monday, July 15, 2024</i>	<i>Monday, October 14, 2024</i>
Dispositive Motions	<i>Wednesday, September 11, 2024</i>	<i>Thursday, December 12, 2024</i>

Scheduled Event	Current Deadline	Proposed Deadline
Joint Pretrial Order	<i>Friday, October 11, 2024</i>	<i>Monday, January 13, 2025</i> <i>If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.</i>

WHEREFORE, the parties respectfully request this Court extend the discovery period by ninety (90) days from the current deadline of August 12, 2024 up to and including November 12, 2024, and extend the other dates as outlined in accordance with the table above.

IT IS SO STIPULATED.

DATED the 2nd day of April, 2024.

BENSON ALLRED

/s/ Joshua L. Benson

JOSHUA L. BENSON
Nevada Bar No. 10514
333 N. Rancho Drive, Suite 420
Las Vegas, Nevada 89106
Attorney for Plaintiff

DATED the 2nd day of April, 2024.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ Robert W. Freeman

ROBERT W. FREEMAN
Nevada Bar No.: 3062
E. MATTHEW FREEMAN
Nevada Bar No.: 14198
6385 S. Rainbow Blvd., Ste. 600
Las Vegas, Nevada 89118
Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated this 3rd day of May _____, 2024.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE